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December 23, 2020

By ECF

Honorable Frederic Block
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Insurance Company et al v. Moshe et al*
Docket No.: :20-cv-01098-FB-RER

Dear Judge Block:

As the Court is aware, we are counsel to Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company, and GEICO Casualty Company (collectively “Plaintiffs”) in this matter.

I write as a follow up to my letter of December 1, 2020 and the December 7, 2020 order issued by Magistrate-Judge Reyes. As previously reported to the Court on December 1, 2020, Plaintiffs reached a settlement with Defendants Nizar Kifaieh, M.D., Premier Anesthesia Associates PA, Regina Moshe, M.D., Citimedical I PLLC, Citimed Services, PA, Yan Moshe a/k/a Yan Leviev, Hackensack Specialty ASC LLC f/k/a Dynamic Surgery Center, LLC, Integrated Specialty ASC, LLC f/k/a Healthplus Surgery Center, LLC Excel Surgery Center, L.L.C., and NJMHMC LLC d/b/a Hudson Regional Hospital (collectively the “Moshe Defendants”). I can now report that the settlement has been fully memorialized and executed by all parties. We expect to file stipulations of dismissal without prejudice in regard to the Moshe Defendants in the near future, and eventually, stipulations of dismissal with prejudice.

Plaintiffs and Defendants Leonid Shapiro, M.D. and Neurological Diagnostics Professional Association (the “Shapiro Defendants”) continue to discuss settlement but have not yet reached any settlement. In the event that we cannot reach a resolution by early January, Plaintiffs are likely to reach out to Magistrate-Judge Reyes to request his assistance in facilitating a resolution with the Shapiro Defendants.

The Court’s continued attention to this matter is appreciated.



Honorable Frederick Block

December 23, 2020

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Respectfully submitted,

Barry I. Levy

Barry I. Levy, Esq.

cc: All Counsel of Record
Magistrate-Judge Ramon E. Reyes